

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
v.	:	<b>CRIMINAL NO. 22-142</b>
<b>LAYE SEKOU CAMARA</b>	:	
a/k/a “K-1”	:	
a/k/a “Dragon Master”	:	

**GOVERNMENT’S TWELFTH MONTHLY STATUS REPORT**

The United States of America, through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Linwood C. Wright, Jr. and Kelly M. Harrell, Assistant United States Attorneys for the district, and Chelsea Schinnour, Trial Attorney, United States Department of Justice, pursuant to this Court’s October 3, 2023 order, respectfully submits its twelfth monthly status report as follows:

1. In an effort to assure that the government fulfills its ongoing discovery obligations, the government submitted relevant information on its foreign witnesses to Department of Justice officials for them to submit these witnesses’ identifiers to relevant intelligence agencies to determine what, if any, information about these witnesses is in the possession these agencies. The agencies have completed gathering possibly responsive information, and the government has completed its review of this information. On June 4, 2024, the government refiled its Motion for a Pretrial Conference Pursuant to the Classified Information Procedures Act (CIPA). As noted in that filing the government proposes a bifurcated *in camera* Section 2 conference in this case. Ultimately, pursuant to Section 4 of CIPA, the government anticipates filing appropriate brief(s) addressing the propriety of deleting, substituting, or disclosing classified information, if any, relating to this prosecution. The

government has completed its draft of its Section 4 brief, and it is currently undergoing the required U.S. Department of Justice's National Security Division's review process. The government anticipates filing it with this Court on or before December 16, 2024. The government continues to maintain that at the end of this arguably burdensome CIPA process very few documents will be in play, and those, if any, that are in play, will ultimately have relatively little influence on the timing or outcome of this case.

2. Because of the nature of this prosecution, generating the reports of investigation based on the interviews of numerous foreign witnesses has proven arduous. That said, on August 9, 2024, the lion's share of the Jencks Act material was produced to the defendant. This production consisted of 19 HSI Reports of Investigation all of which are witness interviews. Thus far the government has produced a total of 47 HSI reports, 23 of which are witness interviews. There is arguably very little Jencks Act material that is still outstanding. Within the next two weeks the government anticipates generating and producing what little Jencks Act material remains outstanding.

Respectfully submitted,

JACQUELINE C. ROMERO  
United States Attorney

/s/ Linwood C. Wright, Jr.  
LINWOOD C. WRIGHT, JR.  
KELLY M. HARRELL  
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Twelfth Monthly Status Report, was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

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DATED: October 3, 2024